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1	Patrick J. Reilly
	Nevada Bar No. 6103
2	Eric D. Walther
	Nevada Bar No. 13611
3	BROWNSTEIN HYATT FARBER SCHRECK, LLF
	100 North City Parkway, Suite 1600
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	Telephone: 702.382.2101
5	Facsimile: 702.382.8135
	preilly@bhfs.com
6	ewalther@bhfs.com
7	Attorneys for The Fremont Street Experience
	Limited Liability Company
8	, , ,

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

KELVIN GORDON, an individual; LILITH MCGRATH, an individual; KIANA FULLMORE, an individual; and the AMERICAN CIVIL LIBERTIES UNION OF NEVADA FOUNDATION, INC., a domestic nonprofit corporation,

Plaintiffs.

V.

THE CITY OF LAS VEGAS, a local municipal government entity; and FREMONT STREET EXPERIENCE, LLC, a domestic limited liability company;

Defendants.

Case No. 2:22-cv-01446-RFB-EJY

DECLARATION OF THE LAS VEGAS METROPOLITAN POLICE DEPARTMENT IN SUPPORT OF OPPOSITION TO MOTION FOR TEMPORARY RESTRAINING ORDER

- I, Gina Fackrell, hereby declare as follows:
- 1. I have personal knowledge of the matters stated herein except those matters stated upon information and belief, and as to those matters, I believe them to be true. I am over the age of eighteen and if called as a witness, I am competent to testify to the matters stated herein.
- 2. I am a Manager in the Crime Analysis Group of the Central Intelligence Unit of the Las Vegas Metropolitan Police Department ("LVMPD").

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3.	From	May	15,	2022	through	July	6,	2022,	there	were	14	incident	s of	crime
involving wea	apons at	the Fr	remo	nt Str	eet Expe	rience	. T	his inc	ludes	4 incid	lents	s of crim	e inv	olving
actual violence	e.													

- 4. From July 7, 2022 through August 31, 2022, after the enactment of Special Event Permit 362490, there were only 3 incidents of crime involving weapons at the Fremont Street Experience, which represents a 78% decrease. There were zero incidents of crime involving actual violence, which represents a 100% decrease.
- 5. Moreover, from July 7, 2022 through August 31, 2022, there were zero incidents of violent crime involving people under 21 years old.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 30th day of September, 2022.

<u>/s/ Gina Fackrell</u> Gina Fackrell, #10169

1	CERTIFICATE OF SERVICE
2	Pursuant to Fed. R. Civ. P. 5(b), and Section IV of District of Nevada Electronic Filing
3	Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK,
4	LLP, and that the foregoing DECLARATION OF THE LAS VEGAS METROPOLITAN
5	POLICE DEPARTMENT IN SUPPORT OF OPPOSITION TO MOTION FOR
6	TEMPORARY RESTRAINING ORDER was served via electronic service on the 30th day of
7	September, 2022, to the addresses shown below:
8 9	Christopher M. Peterson, Esq. Sophia A. Romero, Esq. AMERICAN CIVIL LIBERTIES UNION OF NEVADA John A. Curtas, Esq. City of Las Vegas City Attorney's Office – Civil Division jacurtas@lasvegasnevada.gov
10	peterson@aclunv.org romero@aclunv.org Attorneys for The City of Las Vegas
11	Attorneys for Plaintiffs
12	
13	
14	an employee of BROWNSTEIN HYATT FARBER
15	SCHRĒCK, LLP
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